

EXHIBIT 2

- WILL GRANNIS -

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

----- X
ULKU ROWE,

Plaintiff,

Case No.
19 Civ. 08655 (LGS) (GWG)

v.

GOOGLE LLC

Defendant.

----- X

DATE: October 29, 2020

TIME: 11:33 A.M.

VIDEOTAPED VIDEOCONFERENCE DEPOSITION

OF WILL GRANNIS, held via Zoom, pursuant to
Notice, before Hope Menaker, a Shorthand Reporter
and Notary Public of the State of New York.

Will Grannis
October 29, 2020

158 to 161

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| <p style="text-align: right;">Page 158</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 Q. So -- right, he writes "The role</p> <p>2 responsibility is the same, but with a more</p> <p>3 targeted focus on the FSI global clients,"</p> <p>4 correct?</p> <p>5 A. Yes, more customer focus.</p> <p>6 Q. And then in next paragraph he</p> <p>7 discusses the financial services vertical lead</p> <p>8 role?</p> <p>9 A. Yes.</p> <p>10 Q. Did Google have any requirement that</p> <p>11 there be a certain number of external candidates</p> <p>12 when hiring for a position?</p> <p>13 MR. GAGE: Objection.</p> <p>14 A. I'm not aware of any such</p> <p>15 requirement.</p> <p>16 Q. Okay. You can put that aside.</p> <p>17 I would like you now to look at Tab</p> <p>18 88.</p> <p>19 A. Okay.</p> <p>20 Q. We're going to mark --</p> <p>21 MS. GREENE: Ken, do you have the</p> <p>22 document as well?</p> <p>23 MR. GAGE: I do. Thank you.</p> <p>24 Q. We're going to mark this as Exhibit</p> <p>25</p> | <p style="text-align: right;">Page 160</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 role." Was that consistent with what your</p> <p>2 understanding was; does that reflect what your</p> <p>3 understanding was as well?</p> <p>4 MR. GAGE: Objection.</p> <p>5 A. Again, I didn't have knowledge of the</p> <p>6 requirements of the -- the role and what levels</p> <p>7 would be considered for it. My only knowledge was</p> <p>8 a general observation of patterns broadly, not</p> <p>9 specific to this role.</p> <p>10 Q. If you can look at Ms. Rowe's</p> <p>11 response to you -- Ms. Rowe's response I should</p> <p>12 say, she says "I do find it troubling that all the</p> <p>13 external candidates to date have been considered</p> <p>14 for the VP role and I would not be. I know the</p> <p>15 two finalists to date and I firmly believe I am</p> <p>16 more qualified and bring more to the table than</p> <p>17 both of them. I'm only looking for a fair</p> <p>18 treatment as the external candidate." Do you see</p> <p>19 that?</p> <p>20 A. I do.</p> <p>21 Q. Had you discussed with Ms. Rowe</p> <p>22 generally the types of people that were being</p> <p>23 considered for the VP role?</p> <p>24 A. I didn't know who was being</p> <p>25</p> |
| <p style="text-align: right;">Page 159</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 94, Bates stamped GOOG-ROWE-00006729 through 730.</p> <p>2 (Whereupon, Exhibit 94 was marked for</p> <p>3 identification.)</p> <p>4 Q. On June 14, 2018 at 11:25, do you see</p> <p>5 Melissa Lawrence's e-mail?</p> <p>6 A. I do.</p> <p>7 Q. And looking at that second paragraph.</p> <p>8 What she writes there with respect to levelling,</p> <p>9 was it your understanding that even though the</p> <p>10 role had been scoped as a VP level role it was</p> <p>11 not possible for -- for Ms. Rowe to move from the</p> <p>12 Level 8 to the VP level?</p> <p>13 MR. GAGE: Objection.</p> <p>14 A. I -- I wasn't involved in selecting</p> <p>15 for the role, so I can't -- you know, I can't talk</p> <p>16 to what selection criteria and how they would</p> <p>17 choose internal versus external and how they would</p> <p>18 do that. I do -- I do know that in my experience</p> <p>19 at Google transfers between orgs very rarely come</p> <p>20 with any promotion.</p> <p>21 Q. Okay. So here she writes, "I do want</p> <p>22 to flag that if you were to be selected for this</p> <p>23 role you would do it at your current level. We do</p> <p>24 not up-level candidates when taking on a new</p> <p>25</p> | <p style="text-align: right;">Page 161</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 considered, so no.</p> <p>2 Q. Okay. Can you turn to Page 89 -- or</p> <p>3 Tab 89 I should say.</p> <p>4 A. Hold on, I have to turn my computer</p> <p>5 sideways.</p> <p>6 Okay.</p> <p>7 Q. We're marking this as Exhibit 95,</p> <p>8 Bates stamped P000706.</p> <p>9 (Whereupon, Exhibit 95 was marked at</p> <p>10 this time.)</p> <p>11 Q. Do you recognize this exchange with</p> <p>12 Ms. Rowe?</p> <p>13 A. Yeah, looks familiar.</p> <p>14 Q. Okay, and if you can look -- is that</p> <p>15 you on the left-hand side?</p> <p>16 A. It is.</p> <p>17 Q. Okay, and if we can look at the</p> <p>18 second entry from the bottom that begins with</p> <p>19 "You're awesome, Ulku"?</p> <p>20 A. Yep.</p> <p>21 Q. Do you see where it says "Time to</p> <p>22 crush two other obviously inferior candidates"?</p> <p>23 A. Yes.</p> <p>24 Q. Did you know with particularity who</p> <p>25</p> |

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162 to 165

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| <p style="text-align: right;">Page 162</p> <p>1 - WILL GRANNIS -</p> <p>2 those candidates were?</p> <p>3 A. No, this was -- this was a</p> <p>4 motivational note to -- in support of an employee</p> <p>5 of mine who was going up for something, for</p> <p>6 another job.</p> <p>7 Q. A job that you believe that she was</p> <p>8 qualified for, correct?</p> <p>9 MR. GAGE: Objection.</p> <p>10 A. A job I certainly believed that if</p> <p>11 she thought she was qualified for and she's being</p> <p>12 given an opportunity to interview for, she should</p> <p>13 go out and do it to the best of her ability which</p> <p>14 is why I start the thing with "you're awesome, go</p> <p>15 get it."</p> <p>16 Q. Can you identify any employees in</p> <p>17 Google Cloud that you believed were move qualified</p> <p>18 for the position as financial services vertical</p> <p>19 lead, so internal candidates, than Ms. Rowe?</p> <p>20 MR. GAGE: Objection, asked and</p> <p>21 answered.</p> <p>22 A. It would be extremely difficult for</p> <p>23 me to rewind back in time and think back to when</p> <p>24 this was happening and think about all the people</p> <p>25 that could have been and should have been</p> | <p style="text-align: right;">Page 164</p> <p>1 - WILL GRANNIS -</p> <p>2 qualifications for a vertical lead like that.</p> <p>3 Q. So is the answer that you're not</p> <p>4 aware of anyone who's more qualified?</p> <p>5 MR. GAGE: Objection. I don't think</p> <p>6 that's what he said.</p> <p>7 A. My answer is I can't assess it.</p> <p>8 Q. I'm asking you using what you know</p> <p>9 about Ms. Rowe and about other people to tell</p> <p>10 me based on what you know of Ms. Rowe's</p> <p>11 qualifications, is there anyone that you know who</p> <p>12 has greater qualifications with respect to the</p> <p>13 financial services vertical lead role?</p> <p>14 MR. GAGE: Objection, asked and</p> <p>15 answered.</p> <p>16 A. I mean, I can't -- I can't think of</p> <p>17 someone because I can't evaluate -- I can't</p> <p>18 evaluate what those criteria would be. I never</p> <p>19 hired for that type of a role before, so I don't</p> <p>20 know how I would evaluate.</p> <p>21 Q. Okay, but there's also no obvious</p> <p>22 like absolutely it's this person who blows Ulku</p> <p>23 out of the water; is that -- is that a fair</p> <p>24 summary then?</p> <p>25 A. That would req --</p> |
| <p style="text-align: right;">Page 163</p> <p>1 - WILL GRANNIS -</p> <p>2 considered. I mean, this is an organization of</p> <p>3 tens of thousands of people so I guess I have a</p> <p>4 really hard time answering that definitively.</p> <p>5 Q. I'm asking something a little</p> <p>6 different which is: Sitting here right now if you</p> <p>7 were to say based on everyone that I know in</p> <p>8 Google Cloud or I'm familiar with in Google Cloud,</p> <p>9 is there someone who you think was more qualified</p> <p>10 for the financial services vertical lead than Ms.</p> <p>11 Rowe?</p> <p>12 MR. GAGE: Objection. For what role?</p> <p>13 MS. GREENE: The financial services</p> <p>14 vertical lead role.</p> <p>15 MR. GAGE: In Tariq Shaukat's</p> <p>16 organization mis that the one you're talking</p> <p>17 about?</p> <p>18 Q. I'm talking about the financial</p> <p>19 services vertical lead role that we're discussing</p> <p>20 right now.</p> <p>21 MR. GAGE: Okay. Objection.</p> <p>22 A. I mean, there's a reason why I don't</p> <p>23 hire for vertic -- financial services vertical</p> <p>24 lead, because it's not an area I know well enough</p> <p>25 to be a definitive, you know, expert in assessing</p> | <p style="text-align: right;">Page 165</p> <p>1 - WILL GRANNIS -</p> <p>2 MR. GAGE: Objection.</p> <p>3 A. That would -- it would require me to</p> <p>4 know the -- the tenets of the job well enough to</p> <p>5 make the same assessment, but in reverse.</p> <p>6 Q. Do you know whether she was, in fact,</p> <p>7 interviewed for the role?</p> <p>8 A. You know what, I don't -- with a</p> <p>9 hundred percent certainty, I -- I don't know.</p> <p>10 Q. Now, at that point in time you had</p> <p>11 been supervising -- you had supervised her for a</p> <p>12 little over a year in OCTO before she moved out of</p> <p>13 your organization or a year and a half,</p> <p>14 approximately.</p> <p>15 A. Uh-huh.</p> <p>16 Q. Did anyone speak with you about her</p> <p>17 candidacy for this position?</p> <p>18 A. I was not on the hiring panel. I was</p> <p>19 not, you know, given a formal recommendation, but</p> <p>20 I definitely provided to Brian as noted earlier,</p> <p>21 you know, enthusiasm as I directed to Ulku</p> <p>22 directly, enthusiasm for her qualifications and</p> <p>23 knowledge around financial services, so...</p> <p>24 Q. In the hiring process either for</p> <p>25 internal or external candidates, is there a means</p> |